

D.H. PACE COMPANY, INC. vs MATTHEW JOHNSON, ET AL.
Neil Broom on 07/25/2023

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 D.H. PACE COMPANY, INC., :
5 Plaintiff, :
6 versus : CIVIL ACTION FILE
7 MATTHEW JOHNSON; CRAIG JOHNSON : NUMBER:
8 and LIBERTY GARAGE DOOR : 1:22-cv-1005-SEG
9 SERVICES, LLC, :
Defendants. :

11 DEPOSITION OF NEIL BROOM

12
13 12:00 P.M.

14 July 25, 2023

15 CONDUCTED REMOTELY

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18 Susan DiFilippantonio, RPR, CCR No. B-2125
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1 APPEARANCES:

2 On Behalf of the Plaintiff, D.H. PACE COMPANY, INC.:

3 FELLOWS LABRIOLA, LLP

4 BY: Stephen T. LaBriola (via videoconference)

5 233 Peachtree Street, NE

6 Suite 2400

7 Atlanta, GA 30303

8 404.586.9200

9 slabriola@fellab.com

10 On Behalf of the Defendants, MATTHEW JOHNSON; CRAIG
11 JOHNSON and LIBERTY GARAGE DOOR SERVICES, LLC:

12

13 HALL, GILLIGAN, ROBERTS & SHANLEVER, LLP

14 BY: Wayne M. Cartwright (via videoconference)

15 3340 Peachtree Road, NE

16 Suite 1900

17 Atlanta, GA 30326-1082

18 404.247.0994

19 wcartwright@hgrslaw.com

20

21 Also Present: Dana Mehrer, via videoconference

22

23 Craig Johnson, via videoconference

24

25 Ethan Knott, via videoconference

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27 Matthew Johnson, via videoconference

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1 (Tuesday, July 25, 2023 12:00 P.M.)

2 NEIL BROOM,
3 called as a witness at the instance of the Defendants,
4 being first duly sworn, was examined and deposed as
5 follows:

6 EXAMINATION

7 BY MR. CARTWRIGHT:

8 **Q. All right, Mr. Broom.**

9 MR. CARTWRIGHT: This will be the
10 deposition of Neil Broom, taken in the matter of
11 D.H. Pace Company versus Matt Johnson et al. It
12 will be taken for all purposes allowable under the
13 Federal Rules of Civil Procedure and Discovery.

14 Steve, are we in agreement to reserve
15 objections except to the form of the question until
16 first use?

17 MR. LABRIOLA: And responsiveness of the
18 answer, yes.

19 MR. CARTWRIGHT: And responsiveness of
20 the answer. Okay. Very good.

21 BY MR. CARTWRIGHT:

22 **Q. Mr. Broom, I am going to do an abbreviated**
23 **version of my opening because I think, if I read all of**
24 **your materials right, this is not your first deposition;**
25 **is that correct?**

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1 A. That's correct, sir.

2 Q. All right. So you know the deal here. I will
3 ask you some questions. You answer them to the best of
4 your knowledge. The only thing that I want to focus
5 with in this preamble is that I am going to ask you some
6 questions that don't make sense. I'm not going to mean
7 to ask you questions that don't make sense. I am just
8 going to ask you one. And when I do, I will not be
9 offended. Just tell me that it does not make sense, and
10 I will be happy to repeat it or rephrase it so that it
11 makes sense to you so that we get a clean record. If
12 you don't tell me that, I am going to assume that you
13 understood my question. Okay? But otherwise, I will
14 move forward and hope that you correct me if I
15 somehow -- or when I ask you a bad question.

16 Does that work?

17 A. Yes, sir.

18 Q. All right. I don't think that this should take
19 too long. This is not a 68-page expert report,
20 thankfully. So hopefully, we can get through pretty
21 quickly, but if you need a break, that's fine. You
22 know, just let me know. I am happy to go off record and
23 let you run to the restroom or something like that.

24 My only request would be that you don't do that
25 while I have got a question pending, but otherwise, just

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1 let me know.

2 Does that work for you?

3 A. Yes, sir.

4 Q. All right. Well, let's get the background
5 information out of the way pretty quickly. I don't want
6 to waste our time. I know I have your resume and stuff
7 like that, but I do want to get a little bit of it on
8 the record.

9 So could you just state your full name for the
10 record, please.

11 A. Neil Broom.

12 Q. And what is your current occupation, Mr. Broom?

13 A. I am the president and lab director for
14 Technical Resource Center, Inc.

15 Q. Okay. And what is Technical Resource Center,
16 Inc.?

17 A. A computer forensics and cell phone forensics
18 lab.

19 Q. Okay. And you have a dual role as president and
20 lab director.

21 So can you briefly describe what you do as
22 president and what you do as lab director?

23 A. President for the business side, lab director
24 for the forensics side.

25 Q. And as part of your qualifications, your resume

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1 showed multiple certifications.

2 I assume that that is all still up-to-date and
3 an accurate representation?

4 A. Yes, sir.

5 Q. Okay. And I will not ask you about each one of
6 those. We will move on.

7 I do want to get a little bit -- how long have
8 you been in the computer forensic businesses?

9 A. I started Technical Resource Center in 2000, and
10 I guess my -- I guess we would back up and say my first
11 computer forensics certification, 2004.

12 Q. Okay. And are you certified as it relates to
13 computers and cell phones?

14 A. Yes, sir.

15 Q. What about do you have any specific
16 certifications that relate to e-mail accounts?

17 A. I only have the general certifications,
18 including e-mail.

19 Q. Okay. All right. And I know that you have
20 served as an expert witness, and I am not asking you to
21 count up the number of times that you listed.

22 But could you ballpark that for me? Would you
23 say that you have served more or less than 50 times?

24 A. More.

25 Q. Okay. And have you testified more or less than

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1 50 times?

2 A. I would say probably 30 times. It's kind of a
3 loaded question for me since I am an ex-law enforcement
4 officer. So I have plenty of time in court as a cop
5 before becoming an expert, but I was a DUI expert. So I
6 was an expert when I was testifying in court there too.

7 Q. Understood. Well, let me rephrase those
8 questions because -- thank you for that clarification.

9 As a computer forensics person -- so, I guess,
10 since 2000 roughly -- would you say more or less that
11 you have served as an expert witness 50 times?

12 A. Let's say 30.

13 Q. Okay. And how does this new qualification
14 change your answer about testimony? Is that still
15 around the 30 times as a computer forensics expert?

16 A. Yes.

17 Q. Okay. And does that include testimony in
18 deposition and in court? Or is that just court?

19 A. Deposition and court.

20 Q. Okay. And have you ever worked for D.H. Pace
21 before this engagement?

22 A. No, sir.

23 Q. Have you ever worked for the law firm of Fellows
24 LaBriola before this engagement?

25 A. Yes, sir.

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1 Q. Have you ever testified in your role as an
2 expert for Fellows LaBriola before this case?

3 A. Yes, sir.

4 Q. Okay. Can you ballpark how many times you have
5 done that?

6 A. Testifying for Fellows LaBriola?

7 Q. Yeah.

8 A. I can think of one right off the bat, but there
9 might have been a second.

10 Q. Okay. And I don't want any specifics, but I
11 assume your role in that dealt with computer forensics
12 and looking at data from someone's computer.

13 Is that an accurate description?

14 A. Yes, sir --

15 Q. Okay.

16 A. -- and computer devices.

17 Q. Computer devices. All right. And were you
18 retained by Fellows LaBriola in this matter?

19 A. Yes, sir.

20 Q. And what was your understanding of your scope of
21 work that you were supposed to do when you were
22 retained?

23 A. I believe it was May of 2021 when I first spoke
24 with Steve LaBriola about this case, and the way that it
25 started was I was presented a proposed ESI protocol to

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1 review to see if I had any input on the protocol. So --
2 which that told me y'all had already started the
3 process. So I was brought in -- Mr. LaBriola was just
4 checking to see if I had any input on what that protocol
5 might need to be changed, and if I remember correctly, I
6 was satisfied with the protocol.

7 Q. Okay. And I sent you an e-mail that had a
8 couple of exhibits earlier.

9 Could you open the one titled Exhibit 1, please?

10 A. It's open.

11 Q. Okay. And looking at that, could you tell me
12 what Exhibit 1 is?

13 A. Exhibit 1 is a copy of my expert report dated
14 June 29, 2023, in this matter.

15 Q. Okay. And you have --

16 MR. LABRIOLA: Wayne, let me just state
17 -- I was just going to say I think that we can
18 probably stipulate with you that it would have been
19 May of 2022, not May of 2021.

20 MR. CARTWRIGHT: Oh, okay.

21 THE WITNESS: Sorry.

22 BY MR. CARTWRIGHT:

23 Q. I think that is right. I am not going to hold
24 you to -- that's fine. I am not -- I am not playing
25 "got you" on dates. It all seems like it's still 2022

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1 to me.

2 Okay. So you said that this was -- Exhibit 1
3 was your expert report?

4 A. Yes, sir.

5 Q. And I think you noted that it was dated
6 June 29th of 2023?

7 A. Yes, sir.

8 Q. Is this the most up-to-date version of your
9 expert report?

10 A. Yes, sir.

11 Q. Got it. All right.

12 MR. CARTWRIGHT: And, Steve, just a
13 little housekeeping. I know that you and Ethan got
14 those -- got these exhibits too. I will plan to --
15 when I call them out, consider them to be admitting
16 the exhibit, and then I will send them to the Court
17 Reporter after we are done, and you, obviously, can
18 be copied on that.

19 Is that okay?

20 MR. LABRIOLA: Sure. It might be easier
21 too if you can just share a screen and pull it up
22 too, whatever you are -- whatever exhibit you are
23 referencing.

24 MR. CARTWRIGHT: Yeah, I will do that on
25 some of them. For the report, just because we will

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1 be flipping through it, I do not want to be
2 manually scrolling down. And I think that Neil has
3 it there.

4 THE WITNESS: Wayne, quick question for
5 you. Did you -- did you get my CV as part of this
6 expert report?

7 MR. CARTWRIGHT: I did. I did, yeah. I
8 got that. I did not send that to you, and I do not
9 need it to be an exhibit.

10 THE WITNESS: I see.

11 MR. CARTWRIGHT: I assume it is what it
12 is, so to speak. I am not going to ask you any CV
13 questions today.

14 BY MR. CARTWRIGHT:

15 Q. You note in paragraph 2 that you collected 33
16 computers, cell phones, e-mail accounts, and online
17 storage accounts?

18 A. Yes, sir.

19 Q. Is that an accurate number of devices and
20 accounts that you have reviewed for this matter?

21 A. Yes, sir.

22 Q. Okay. And kind of explain to me what all that
23 encompassed, to your understanding.

24 A. If you can give me a moment, I can actually be
25 precise with that answer. I did have an e-mail where I

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1 was detailed in my -- in that collection to state what I
2 actually -- I summarized everything.

3 (Defendants' Exhibit 1, Expert Report of
4 Neil Broom, was marked for identification.)

5 BY MR. CARTWRIGHT:

6 **Q. And is this an e-mail that you sent to me?**

7 A. No. This is an e-mail -- actually, it's an
8 e-mail with my original bill to Fellows LaBriola. And
9 in that, I summarized the devices that had been
10 collected. So I can answer your -- like I said, I can
11 answer your question precisely if you would just give me
12 a second.

13 **Q. Okay.**

14 A. So it included 5 computers, 2 iPhones, 5 iPads,
15 13 e-mail accounts, 1 OneDrive online storage account, 1
16 Google Drive online storage account, 2 Facebook
17 accounts, 3 iCloud accounts, and 1 Synology NAS device.

18 **Q. Okay. All right. And were you instructed by**
19 **Fellows LaBriola to look for confidential information of**
20 **D.H. Pace on these devices?**

21 A. Yes, sir.

22 **Q. Okay. And did you locate any confidential**
23 **information -- well, first off, how did those**
24 **instructions -- what were your instructions on that?**
25 **What did they say about confidential information?**

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1 A. I was actually provided a sample of confidential
2 information that they had already determined was
3 exfiltrated from the company and asked to locate that
4 information. Later, during the ESI protocol, keywords
5 were defined. And both sides agreed, and that is what
6 we searched for.

7 **Q. So did you do any other type of searching**
8 **besides those two methods?**

9 A. Before the keywords were agreed upon, we used
10 the confidential information to try to develop our own
11 keyword list, and then the attorneys developed a keyword
12 list for us to use.

13 **Q. Did you actually search the keyword list that**
14 **you used to -- that you developed yourself? Or did you**
15 **only ever search the keyword list developed by the**
16 **attorneys?**

17 A. The keyword list developed by the attorneys is
18 what was used to do production. We -- I would say the
19 easiest way to phrase it was, while we were still
20 getting to learn the evidence, we used our keyword list.

21 So as we -- so in other words, the confidential
22 information, we developed words off of the confidential
23 information to look for and developed a picture of what
24 the evidence showed before y'all confirmed a keyword
25 list, and then we use that for the actual productions.

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1 Q. Okay. And I understand that is for the
2 production.

3 Did you look at any of the data that was
4 generated from your keyword list that you generated?

5 A. No. We were just trying to figure out what it
6 is we would be looking for in the case. So it wasn't --
7 it wasn't, like, a review of trying to figure out what
8 things were. It was just trying to figure out what
9 keywords would work in the matter.

10 Q. Okay. And you said that you searched for
11 specific confidential information.

12 How did you go about searching for that?

13 A. We were provided a sample of the January 28th
14 e-mail and the attachments.

15 Q. Okay. And what -- what process did you use to
16 search the devices and accounts for that e-mail?

17 A. Are you referring to what technical tool we
18 used? Or are you just, in theory, how we searched?

19 Q. Let's start with theory, and we will work to
20 technical tool.

21 A. Okay. So the way our process works is
22 collection of all the evidence is performed first.
23 Obviously, you were involved in the collection process.
24 After we collected it, we preprocessed all of that
25 evidence. So we get it in a form that we can look at

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1 the forensics collection.

2 In this case, AccessData's Forensics Toolkit is
3 one of the tool kits that we used. It works pretty well
4 for ESI collections because it allows us to deal with
5 e-mail in a concise manner. So we like to use that
6 tool. There are other tools that we do use at times,
7 but FTK is the primary tool that we used here to do --
8 to deal with this large volume of data.

9 And then we searched the data using an indexing
10 tool that is built into FTK, and we are basically
11 indexing each of those keywords. So anywhere there is a
12 hit for the keyword, that is how we produce the files.
13 And in this case, each of the productions I sent to you
14 was because a file in the evidence matched one of the
15 keywords in the index of it.

16 **Q. Did you do anything other than a keyword-based**
17 **search when looking for the specific e-mail that you**
18 **were provided with?**

19 A. No, sir.

20 **Q. So it was just keywords drawn from that e-mail**
21 **that you used to locate confidential information?**

22 A. Right. And the specific January 28th e-mail, we
23 found immediately. It was -- it was not hard for us to
24 find that e-mail.

25 **Q. Right. Had you the keyword, and so you could**

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1 type it in and --

2 A. We had a copy of the actual message. So finding
3 the actual message in the evidence was, you know, easy.

4 Q. Okay. Other than that January 28th e-mail, did
5 you locate on these 33 devices any other confidential
6 information of D.H. Pace's?

7 A. I would say yes, and that information was all
8 included in the production that we provided to you and
9 then, after you cleared it for privilege, that we
10 provided to Fellows LaBriola.

11 Q. Okay. You do not identify any of that in your
12 expert report, any of the other confidential
13 information.

14 So what other confidential information did you
15 locate?

16 A. I can't recall at this point. It's not part of
17 my expert testimony in this case. So I don't -- I don't
18 have a recollection of what it was exactly. I produced
19 so much data. I -- basically, I will summarize it to
20 say my expert report was based on what Fellows LaBriola
21 just described as necessary for this case. So I'm
22 assuming the other documents were not something that
23 they requested me to do an expert testimony on.

24 Q. And the keyword search was not limited,
25 though -- or do you know whether the keyword searches

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1 that you were running was limited to confidential
2 information or if it included relevant information to
3 other accounts in this case?

4 A. I don't recall right off the top of my head.

5 Q. So other than this one e-mail that you have
6 identified in your report, you are not prepared to
7 provide any testimony about other confidential
8 information that may have been discovered on these
9 devices; is that your position?

10 A. That's correct. I am limiting my testimony to
11 the January 28, '21, e-mail.

12 Q. Okay. And no other e-mail whatsoever?

13 A. Correct.

14 Q. Okay. Could you talk to me a little bit about
15 the collection process? How did that go about
16 occurring?

17 A. I had an associate go to the -- your client's
18 office. If I remember correctly, they had a similar
19 instance with the Court Reporter this morning. Got
20 there and started imaging on the first day, and the
21 power went out. So we had to have a return visit, and I
22 believe it was a total of three days, maybe four days
23 total to get all the evidence preserved. And then that
24 information was then sent to my lab in Florida for
25 processing.

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1 Q. And did you make physical images of the devices?

2 A. Correct. Correct. Greg Fordham was the person
3 who did the imaging for us, and he physically imaged
4 each of the devices that were at the facility, at your
5 client's facility. And then after that, we imaged
6 several accounts online. So we did that over the
7 internet, as opposed to physically taking possession of
8 something.

9 Q. And did that the -- did that involve my clients
10 cooperating with your forensic associates in order to
11 obtain these images?

12 A. Yes, sir.

13 Q. And did the iCloud accounts involve them
14 providing username and password information?

15 A. Yes, sir.

16 Q. And did it involve them being available and
17 willing to give you two-factor authentication clearance?

18 A. Yes, sir.

19 Q. And so that I can cite it later, what is
20 two-factor authentication?

21 A. Two-factor authentication is using two of the
22 following three things: Something you are, something
23 you know, and something you have. And the factor way --
24 and the way two-factor authentication is concerned, it's
25 the username and password. That is something you know.

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1 And something you have would be, like, access to a cell
2 phone, and so a secondary request is made of the cell
3 phone. When you try to log in to the account, it sends
4 a passcode. You then have to provide that passcode in
5 addition to the password. So you have to physically
6 possess the phone in order to receive the passcode. You
7 already have the username and password. The two
8 together will allow you into the account. And it's --

9 **Q. And my clients cooperated -- very sorry.**

10 A. It's limited in time. So you have to do it
11 within a minute or two.

12 **Q. And so my clients cooperated in providing that**
13 **information to you or your forensic associates while**
14 **making those collections?**

15 A. Yes, sir.

16 **Q. And it was a total of 33 devices and accounts --**

17 A. Yes, sir.

18 **Q. -- that you imaged?**

19 A. Yes, sir.

20 **Q. Did that seem like a lot of devices and**
21 **accounts?**

22 A. Not to me. I have another one where I have 88
23 devices. So it's -- it's kind of normal for us.

24 **Q. Okay. Other than the AccessData's FTK software,**
25 **did you use any other software in this matter?**

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1 A. X-Ways Technology has a program called X-Ways --
2 I am sorry. I forget the name of the company briefly.
3 X-Ways is the name of the program, the software program
4 we use, and we also use Cellebrite to analyze the cell
5 phones.

6 **Q. What -- what is X-Ways? How does -- what does**
7 **that apply to? What do you use that on?**

8 A. Computer images -- images of computer hard
9 drives and peripherals like USB drives, things like
10 that. So it's a forensics tool in the same manner that
11 AccessData's forensics tool FTK is, but it just displays
12 the data in a different format. Some tools are better
13 than others.

14 I am trying to remember -- I was trying to
15 answer your last question. We might have used Magnet
16 Forensics' AXIOM program also, A-X-I-O-M.

17 **Q. Okay. And what does that program do?**

18 A. They are, again, just different strengths for
19 processing data. Some display data better. Some make
20 it easier for you to find data. Some find data; the
21 other ones don't. So we kind of use a combination to
22 make sure we are getting all the information we can.

23 **Q. And just so I have a list here and I am not**
24 **missing anything, that is AccessData's FTK, X-Ways**
25 **software -- is that X, the letter, Ways? Or --**

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1 A. Yes, sir.

2 Q. -- Cellebrite and AXIOM. Any other softwares?

3 A. That's it, I believe.

4 Q. In those 33 devices and accounts, could you give
5 me a rough number of the amount of e-mails that you
6 reviewed?

7 A. No. I'm sorry. I can't begin to tell you that
8 one.

9 Q. Would it be over 100,000, you think?

10 A. I'm sorry. I really can't even ballpark that
11 right now. I got them all right here, but they are in
12 multiple productions. So I would have to literally add
13 them up and count.

14 Q. But only one is the confidential information
15 that you are prepared to testify about today; is that
16 correct?

17 A. That's correct.

18 (Defendants' Exhibit 2, January 28, 2021
19 E-mail, was marked for identification.)

20 BY MR. CARTWRIGHT:

21 Q. And if you will look at it, I think that's
22 Exhibit 2 that I sent you?

23 A. Yes, sir, this is -- Exhibit 2 is a
24 representation of the e-mail in question. However, this
25 particular copy of the message is not the one that I

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1 used for my expert report, and if you will indulge me
2 just briefly, I can explain what I am talking about.

3 **Q. Yeah, sure.**

4 A. And it's a very precise thing. So most people
5 probably would not pick up on it.

6 If you look at page 5 of my forensics report --

7 **Q. Yes.**

8 A. -- you will see that the subject of mine is
9 forward forward pricing. There is two forwards.

10 **Q. Okay.**

11 A. Exhibit 2, notice the subject is forward
12 pricing. So the example you gave on Exhibit 2 would
13 have been the D.H. Pace sending e-mail, where the one in
14 my report is the Gmail receiving e-mail.

15 **Q. Okay. Understood.**

16 A. Same information, just different sources.

17 **Q. Understood. Same e-mail, but this is one from**
18 **D.H. Pace's system that we've marked as Exhibit 2. And**
19 **the one that you listed in your expert report on page 5**
20 **is the one that came from the Gmail account?**

21 A. Correct. So the source and the receiver, sender
22 and receiver.

23 **Q. Okay. Understood. All right. And this**
24 **e-mail -- that is not particularly relevant to the**
25 **questions that I want to ask about it -- but this e-mail**

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1 has a few attachments; is that correct?

2 A. Four, yes, sir.

3 Q. Okay. Did you locate this e-mail or this e-mail
4 on any other device and account in the 33 accounts and
5 devices that you reviewed besides the Gmail and Matt
6 Johnson's HP laptop?

7 A. No, sir.

8 Q. Okay. Did you locate any of the attachments on
9 any other of the 33 devices that you reviewed other than
10 Matt Johnson's Gmail and Matt Johnson's HP laptop?

11 A. No, sir.

12 Q. Okay. And I understand that the attachments
13 were kind of located in two different forms; is that
14 accurate?

15 A. Yes, sir.

16 Q. Let's talk about the first initial form that
17 they were located in.

18 What was that?

19 A. So very technical concept here. I would suffice
20 to say there is a lot of people that would have no idea
21 that this particular area exists on a Windows computer,
22 meaning a user not knowing that it exists. There is an
23 area called the Microsoft.windowscommunicationsapp --
24 that is all one word -- underscore -- and then I am
25 going to give a number/letter sequence -- 8; W, as in

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1 whiskey; E, as in echo; K, as in kilo; Y, as in yankee;
2 B, as in boy; 3; D, as in delta; B, as in boy; B, as in
3 boy; W, as in whiskey; E, as in echo.

4 That's the name of a particular directory on a
5 Windows computer, and what that directory is used for or
6 used by is the Microsoft mail and calendars app. The
7 Microsoft mail and calendars app is a built-in
8 application that allows you to read mail on a Windows
9 computer if you have not purchased Outlook. So you
10 don't -- if you have not purchased another type of mail
11 program, it's the built-in mail program that you can
12 use.

13 That mail program, when you receive an e-mail
14 message and there is an attachment, the attachments get
15 stored in the directory that I just named. And, again,
16 it's not something that the user knows about. It's just
17 done automatically, and those attachments are now stored
18 on the computer in this directory.

19 If you were to go to the directory and delete
20 the message -- delete the attachments, you would no
21 longer be able to call them up in your e-mails. So you
22 would pull up an e-mail that had attachments, try to
23 look at the attachments, and it would not work. So it's
24 where the e-mail attachments are kept when you receive a
25 message. Or, let's say, synch a message from an old

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1 store, you bring them onto the computer. That is how
2 the -- that's where the messages are stored at -- I'm
3 sorry -- the attachments are stored at.

4 Q. And would a typical user have any knowledge of
5 how to navigate to that folder, in your experience?

6 A. No, sir.

7 Q. Is that folder hidden within the Microsoft
8 folder trees?

9 A. I don't want to use the word "hidden" because --
10 I was actually going to write that in my expert report,
11 and then -- let's put it this way: I stumbled across it
12 as a user, and if you -- if you do a certain technique
13 to save a file, you will -- that directory is right
14 there. So in other words, I was going to say it's a
15 hidden directory, it can't be accessed by the user, and
16 then while testing that hypothesis out, I actually was
17 able to stumble across it as a user while trying to save
18 the file.

19 So it's not something most users know about, but
20 if you go to save an attachment, it will pop up on your
21 screen and say, "you want to save this right here," and
22 now you have that directory. And then if you need
23 something from that directory, if you wanted to write it
24 then -- but like I said, if you delete it, it's no
25 longer available as you are reading through your

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1 e-mails.

2 Q. Right. And in your report, on paragraph 20, you
3 state that the attachments are not deleted.

4 Is that as of when you did the review?

5 A. Yes, sir. Let's put it this way: In the
6 forensics collection that we have, the messages -- the
7 attachments are still in that folder. So that's the --
8 that's the hard copy -- or the -- that's the preserved
9 copy that we are working from.

10 Q. Right. But you are not making any claim that
11 you have knowledge of whether it's still there, sitting
12 in July 25, 2023, correct?

13 A. On Matt Johnson's computer --

14 Q. Correct.

15 A. -- I have no idea.

16 Q. Okay. I thought so. I just wanted to be clear
17 for the record.

18 A. Understood.

19 Q. And I think we talked about how they were
20 located in two places. That's one of them. And then
21 there was a slight change to them located somewhere
22 else.

23 Can you talk about that?

24 A. So on Matt Johnson's desktop, there was a
25 directory titled "business opportunity." The business

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1 opportunity directory had been created on May 4, 2021.
2 Inside the business opportunity directory, these four
3 attachments had been created on August 21, 2021.
4 However, the name of each of the files was changed to
5 have the word "copy of" attached in front of each of the
6 messages.

7 Through our testing, we were able to figure out
8 why "copy of" was attached in front of each -- each
9 attachment's name, and that was due to -- I guess the
10 easiest way is for me to give an example -- if you open
11 up an e-mail message that has Excel spreadsheets as
12 attachments, then you open up the Excel spreadsheet from
13 the e-mail message. Then you select "file save." When
14 you select "file save," it's going to put "copy of" in
15 front of the name of the attachment.

16 **Q. That is the default setting, again?**

17 **A. Yes, sir.**

18 **Q. Yeah. And what folder does that go to for when**
19 **it -- like, what is the default folder that would it**
20 **save into?**

21 **A. Default is kind of a loaded question because I'd**
22 **say, a lot of times, it's whatever the folder was you**
23 **last used.**

24 **Q. That was kind of my question.**

25 **It's just whatever folder you last used is the**

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1 one that pops up initially; is that correct?

2 A. Correct. For many people, that would be the
3 downloads directory on your computer. In this case, the
4 folder that was navigated to was business opportunity to
5 store the files there.

6 Q. Okay. And I think you sent me an e-mail with
7 that directory, and I think that is Exhibit 4 that I
8 sent you.

9 Can you take a look at that?

10 A. Yes, sir, that's correct. I have the e-mail
11 open.

12 (Defendants' Exhibit 3, Outlook
13 Spreadsheet, was marked for identification.)

14 (Defendants' Exhibit 4, Outlook
15 Spreadsheet, was marked for identification.)

16 BY MR. CARTWRIGHT:

17 Q. Okay. And so there was a business opportunity
18 directory?

19 A. That is correct.

20 Q. All right. Can we look at that spreadsheet
21 together?

22 A. I have it open.

23 Q. And this spreadsheet does not reflect that
24 those -- that the copy-of spreadsheets that we are
25 talking about were in that directory; is that correct?

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1 A. That is correct.

2 Q. And that's because -- and we will talk about
3 this later -- they were deleted at some point?

4 A. Right.

5 Q. Got it. And just so that I understand what is
6 in this spreadsheet, though, could you walk me through
7 each column here?

8 A. Certainly. So this is a file-listing
9 spreadsheet from AccessData's Forensic Toolkit. Column
10 A is the name of the file. Column B is a unique item
11 number for the file. Column C --

12 Q. How is that item number generated?

13 A. Column B's item number is automatically
14 generated by Forensic Tool Kit when it first indexes
15 every file on the computer. So it's an
16 automatically-generated number at the beginning of its
17 processing so that, as anything else is done in your
18 case, the -- that unique item number stays the same for
19 each file so it won't be repeated per device.

20 Q. Okay.

21 A. Column C is a -- Column C is referred to as
22 comments. Typically, we have attorneys tell us whether
23 a file is privileged or not privileged, and they fill
24 out the comments section. Right now, it's empty on each
25 of the lines for this file-listing spreadsheet.

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1 Column D is referred to as path. Path is the
2 location of where the individual file on Column A was
3 located on the device. So the -- by looking at the full
4 path on Column D, you can determine what file was in
5 what folder.

6 In this case, we are looking at the business
7 opportunity directory from Matt Johnson's desktop. It's
8 pretty self-explanatory if you follow it through. The
9 first part of the information is -- in the path is what
10 we refer to as the evidence. Our case number was 22024.
11 AB was Matt Johnson's computer. Basic data partition
12 was the physical partition on the device. Partition 3,
13 Windows directory; the root of the Windows directory;
14 the user, Matt Johnson. And then we get to the desktop,
15 which is what you would see as the user in your desktop
16 screen.

17 Q. So as each -- after the desktop, there is, like,
18 a slash, I guess, or forward slash, I think, maybe
19 backslash -- I never could figure those out -- but there
20 is a slash, and there is a name.

21 And does that just represent different file
22 trees?

23 A. Yes, sir. Each one of those is a directory
24 until you get down to the individual file at the end.

25 Q. Okay. I got it. And then moving on to the next

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1 column, E?

2 A. E, is a broad category for what type of file was
3 in Column A. For instance, you could have a JPEG file,
4 Microsoft Excel file, Microsoft Word file, a PDF file.

5 Column F is the extension. So whatever the
6 file, PDF, XLS, DOC X in this case. And then the next
7 file, Column G, is the creation date of the file.
8 Column H is the modified date of the file. Column I is
9 the lasting access date for the file. Column J is the
10 logical size of the file in bytes.

11 **Q. What does that mean?**

12 A. How big it is, how large the file is. So for
13 instance, if I had a notepad document that simply had
14 the word "hello," that would be five bytes long. If I
15 had the book War and Peace, it's going to be multiple
16 megabytes in size.

17 Physical size can be different than the logical
18 size. Physical size is how the file is -- how the
19 logical file is physically stored on the medium, meaning
20 a hard drive or a thumb drive. So the physical size is
21 the exact size of the file, but that has to occupy an
22 even number of sectors, clusters on a physical device.
23 So the physical size is filling out those clusters that
24 the logical size did not actually need.

25 Pretty technical. I did not explain it the

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1 best, but it's -- it's the -- think of it like storing a
2 baseball collection in shoeboxes. It would not -- you
3 did not fill up that last shoebox, but it's too bad.
4 You have got to use the whole shoebox.

5 **Q. Got it. Very excellent explanation.**

6 A. Column L is the MD5 hash. I am not sure how
7 much experience you have with hash values.

8 **Q. Not a ton.**

9 A. So MD5 hash value is -- stands for Message
10 Digest 5. It is a way to digitally sign a file so that
11 you take the original file, you run it through a
12 mathematical algorithm, and you get this fixed-length
13 value of numbers and letters. We can take that same
14 file ten years from now, run it through the algorithm,
15 and if we get the exact same value, we know the file has
16 not changed in the last ten years. Okay.

17 We also do that with entire hard drives. We
18 take the values of all the data on the hard drive, run
19 it through the mathematical algorithm, get this number.
20 Ten years from now, if you want to know if the data has
21 changed, if we run it through the algorithm and it's the
22 same, we know it has not changed.

23 The MD5 value can also be used for comparison
24 purposes. I could have a list of important files that
25 we run through the algorithm. It would list the MD5

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1 hashes, and then now I can scan a computer quickly to
2 see if any of those files exist on the computer exactly
3 the same by looking for its MD5 hash value. If they
4 match, then we know we have an exact copy of the file.
5 That's important because, if I was to change a comma to
6 a period, the MD5 hash value would be different.

7 **Q. Okay.**

8 A. The next column is column M, as in Mary. That
9 is whether it's an actual file or not an actual file.
10 If it's not an actual file, it could be a part of a
11 file, and what I mean by that is think of a Word
12 document. A Word document is the Word document we all
13 read, but it also contains multiple forms of metadata
14 that make up that Word document. So the metadata files
15 would not be part of the Word document. It would not
16 show actual for the Word document because the actual
17 Word document is the actual file. The metadata is made
18 up of that document.

19 **Q. Okay.**

20 A. Carved is used with -- which is column N -- that
21 is used for whether a file was deleted and then
22 resurrected, brought back to life. So we would do what
23 is called data carving.

24 So we start off with the entire forensics image.
25 We then would say I want to recover any files that could

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1 be recovered that have been deleted. And the way we do
2 that is that we data carve those files. It's an
3 automatic process in Forensics Toolkit, and what it does
4 is it looks for the pattern of how a file starts. For
5 instance, a JPEG has a header that the first few bytes
6 of that file are always the same for every JPEG file.
7 So it will look for any patterns that match that JPEG
8 file and start at the beginning of that and then carve
9 out X number of bytes to make a new file of the raw data
10 that is on the drives. So if a file has been deleted,
11 we can bring it back to life, and you can actually see
12 the file, even though Windows can't see it anymore. So
13 that's data carving.

14 So if you see where it says "carved true," that
15 means it was a deleted file and we were able to recover
16 it and bring it back to life. You can do that up until
17 the point the file gets overwritten. So if you have a
18 file on the computer and it gets overwritten, we can no
19 longer data carve that file back to life.

20 **Q. Okay.**

21 A. The next column, column O, is compressed, like a
22 ZIP file or not. Column P is delete. So was the file
23 deleted or not deleted. Q is duplicate file. So was
24 this a primary or secondary. You could have -- you
25 could have the same file multiple times on a device, and

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1 it -- we will list the first time we see the file as the
2 primary, and then each of the other times, we see the
3 file as a secondary. So we don't go into tertiary, etc.
4 It's all either primary or secondary.

5 But sometimes it's important not only that you
6 know a file exists on a device. It's sometimes
7 important to know how many times it exists on the device
8 and, by using the full path, where it exists on the
9 device, using the creative, modified, or access date,
10 when it existed on the device. So that is what the
11 duplicate, section Q, helps us with.

12 E discovery duplicate, column R, is the same
13 idea. The column S, author, is what you would think of
14 by going into a Word document, selecting properties or
15 selecting info, who was the copy of Office registered to
16 that started to type the document. They are the author
17 of the document.

18 Last printed, for column T, if the document had
19 been printed, there is a form of metadata referred to as
20 "last printed," and that is the date there. There is
21 only the last printed. The document was printed a
22 minute before or a year before, you would not know that.
23 You would only have the one entry for last printed.

24 Column U, last saved, is who was the person that
25 saved the document last. So for example, on line 12,

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1 you had an author -- Cassandra Smith was the author of
2 the document on line 12, but Matt Johnson was the last
3 one to save the document. And I don't even know what
4 the document is. I just really was giving an example.

5 **Q. Yeah.**

6 A. And then last save time was the time that Matt
7 Johnson saved that document for column V. Revision
8 number, again, that is an Office setting, how many times
9 has the document been revised. That -- there is a
10 possibility that that is not exact because somebody
11 could turn off, say, track changes. That type of
12 information can be a little iffy sometimes on how many
13 revisions of a document is actually recorded. Same with
14 total editing time. Sometimes, you have a total of
15 editing time for a Word document; sometimes, you don't.

16 What I just said for track changes, column Y,
17 was track changes turned on or not turned on. The
18 majority of people do not use track changes. It's very
19 much a lawyer thing. Y'all use it all the time --

20 **Q. Unfortunately, yes.**

21 A. -- normal people find it's not a normal thing
22 for them.

23 Column Z is encrypted. So was the file
24 encrypted or not encrypted. In this case, I don't
25 believe we had any encrypted files.

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1 Column AA is from recycle bin. So that was was
2 this file found in the trash can on the computer or not.
3 AB is very similar to that. AC is was the particular
4 file an e-mail file, and if it was, that's where the
5 next columns come into play. AD, AE, AF, AG, AH, AI,
6 AJ, and AK, AL, and AM are all dealing with subject,
7 date, time, sender/receiver of e-mail messages. So if
8 the message -- if the attachment -- excuse me -- if the
9 line item was an e-mail message, then have you metadata
10 about that e-mail message.

11 **Q. All right.**

12 A. I think that -- if you have any more questions,
13 I think that lists the data.

14 **Q. Yeah. I think the rest are pretty -- yeah. All**
15 **right. Thank you. I know that was a little boring, but**
16 **I did not know what it meant. So --**

17 A. Understood.

18 **Q. That is what I need you to verify today.**

19 So let's go -- and I think it is probably just
20 to look at Exhibit 3 and the last access report that is
21 attached to that because that has the four documents
22 that you discuss in your report.

23 A. I have it open.

24 (Defendants' Exhibit 5, January 31, 2021,
25 E-mail, was marked for identification.)

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1 BY MR. CARTWRIGHT:

2 Q. Okay. All right. So the first thing I want to
3 do is go through this, but thankfully, it's only through
4 I. So it should be a much shorter time, and then we
5 will talk about the specifics. Okay?

6 So can you walk me through what this -- what's
7 in this spreadsheet?

8 A. Certainly. So this is a -- obviously, you can
9 tell it's made from the same data we just looked at, the
10 file-listings spreadsheet, but it was paired down. It
11 was manually paired down by me. The file-listings
12 spreadsheet was produced by Forensics Toolkit. You can
13 add or subtract columns. In this case, I manually
14 subtracted columns that were not necessary to present
15 the data that I was trying to present.

16 Q. And when you say -- sorry to interrupt, but when
17 you say "you manually did it," does that mean that you,
18 like, had a bigger spreadsheet and you went in and you
19 were, like, delete column B?

20 A. Yes.

21 Q. Okay.

22 A. Just so we wouldn't have to do this the way we
23 just did it on the other example.

24 Q. Understood. Do you still have that spreadsheet
25 that you altered?

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1 A. I don't know. I probably have it someplace. I
2 mean, we can obviously reproduce it within four minutes,
3 but it's -- if it's just a lot of extra information, as
4 you can see, that would not help relay the data to you
5 and to Fellows LaBriola because, again, that --
6 remember, I was -- everything had to go through you
7 first. So you had to understand it. So they could --
8 before they even got to look at it.

9 Q. Right. Okay. So going from there, explain what
10 these things are, which, I guess, this is helpful
11 because they are basically the same as what you just
12 gave us the explanation for?

13 A. Yes, sir. So the name -- so these, again, are
14 specifically the files that were located in the business
15 opportunity directory, but it's the four e-mail
16 attachments that were the confidential information that
17 we originally were looking for --

18 Q. Okay. And so the --

19 A. -- the column --

20 Q. -- the columns, we went over all of them. So
21 just to make sure the date -- they match with what you
22 just explained to us in the previous one?

23 A. Yes, sir. The addition -- there is -- I would
24 say there is many -- a better way to say it was a
25 substitution. We have -- if you notice, before, we had

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1 created, modified, and access date --

2 **Q. Right.**

3 A. -- where we have creation date, and then we have
4 creation time, local, last-write date, last-write time,
5 last-access date, last-access total. This is because we
6 used different reports, different tools to verify the
7 data, and we will also use different types of data to
8 make up a report. And so we got additional information
9 than what we had just in AccessData's Forensic Toolkit.
10 We, in this report, have -- I guess I need to back up a
11 little bit. There are two major types of metadata.
12 There is operating system metadata, which means
13 Windows-generated metadata. And then there is
14 application metadata, and the application metadata is,
15 like, from Microsoft Office, Microsoft Word, Microsoft
16 Excel. Okay?

17 So we have application metadata, and we have
18 file system metadata. What we were looking at before
19 was file system metadata. It came from the Windows
20 operating system. What we have here is in a -- is we
21 have the application metadata. So we have what the
22 Excel spreadsheet is telling us, not what the operating
23 system was telling us.

24 **Q. Okay. So did you run a different report than --**
25 **looking at this, than what we had there and edited it**

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1 down? Or were you adding additional columns to this
2 using the app-based data as well?

3 A. Different report from a different program. All
4 leads to the same information. This is the summary --

5 Q. Okay.

6 A. -- any other forensics person could take the
7 same data we had, and they would get this exact same
8 information. This is just a summary of that
9 information.

10 Q. Well, since it's -- since it is a different
11 report that we ran, then let's just go through the
12 columns again for consistency basis.

13 A. Okay. So if you will notice the tab at the
14 bottom of this, see how it says LNK report?

15 Q. Yes.

16 A. It stands for link report, and a link report is
17 generated -- or a link file is generated when you open a
18 file. So in this case, copy of ATL residential costing
19 was double-clicked, opened on the computer, and that
20 then generated what is called a link file. It's not the
21 file. It's a piece of data saying, hey, that file was
22 opened.

23 Sometimes, what that allows us to do is to see
24 that a file was on the computer, even though the file is
25 no longer on the computer, because the file is gone, but

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1 the link file remains. The user does not know anything
2 about the link file. It's a forensics artifact.

3 So in this case, the data on this screen was
4 generated from the link file for the four attachments.

5 **Q. Okay. All right. And so the first column there**
6 **is name?**

7 A. Name of the file, and the four files are listed.

8 **Q. Local path?**

9 A. The -- that's the path of where the files were
10 originally found at. In this case, in the business
11 opportunity directory of Matt Johnson's desktop.

12 **Q. Okay. Files --**

13 A. File number is, as we stated earlier, how big
14 the file is, the number of bytes. The column D is the
15 creation date, so what date was this file created on
16 that volume on that medium. So in other words, copy
17 of -- copy of and then the Excel spreadsheet was created
18 in business opportunity on 8-21-21. That does not mean
19 the date the ATL residential costing spreadsheet was
20 created. That's what day it was created specifically in
21 the business opportunity directory on the desktop --

22 **Q. Okay.**

23 A. -- so creation date is -- can change. Even
24 though the document does not change, the creation date
25 changes based on when you copy it to a new location, new

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1 physical location. Okay?

2 The creation time is what time that document was
3 created on that -- in that folder. The last-write time
4 and last-write date is when the file was modified, if it
5 was, and it does not have to be. And then lastly, the
6 last-access date, last-access time and is when the file
7 was last touched is a good way to say it, last time
8 somebody opened the document. It doesn't necessarily
9 mean they changed the document, just opened it, just
10 touched it.

11 **Q. Okay. Last-write date, does that mean that the**
12 **document was changed in some way?**

13 A. Modified is what -- is an analogy for it, yes.

14 **Q. Okay. Modified. And what are the types of ways**
15 **that it can be modified?**

16 A. Somebody physically could change a period to a
17 question mark. Somebody could, you know, add data or
18 delete data. You know, anything could be altered on the
19 document and re-saved. So you modified it, you changed
20 something, and then saved the document again.

21 **Q. Okay. Did you do any analysis to see -- it**
22 **looks like the only one that had a last-write date after**
23 **its creation date was the copy of operating -- operator**
24 **pricing?**

25 A. That's correct.

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1 Q. Did you do any analysis to see what could have
2 been changed or what was changed or what was written on
3 it?

4 A. No. No.

5 Q. Okay. Last-access date, explain that to me.
6 What is an access?

7 A. Touching a document. So that could be opening
8 the document up, reading it, doing nothing else, then
9 looking at it, and then closing the document. That
10 could be a last access.

11 Q. Okay. Anything else could be an access?

12 A. It could. If you take a file and drag it to the
13 trash can, that could be a last-access entry --

14 Q. Okay.

15 A. -- there is other ways -- you could delete a
16 file without doing that -- that would not change the
17 last-access date, but that is one where it potentially
18 would change the last-access date.

19 Q. Okay. If you click the file and move it
20 anywhere in the folder, would that change the
21 last-access date?

22 A. Yes, sir.

23 Q. Okay. Anything else that could change the
24 last-access date?

25 A. Yes. We have seen instances in the past where,

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1 like, an antivirus program doing something to the file
2 would change the last-access date --

3 Q. Okay. And --

4 A. -- so something the user did not mean to do but
5 that got done anyway.

6 Q. Okay. And how would that work? What would be
7 the -- how does that -- give me a little more detail on
8 what you mean by that.

9 A. Sure. You got a series -- by the way, the way
10 we know this happens is because you have 100 files in a
11 folder on your computer. All of a sudden, you look at
12 the last-access time, and every single one is the exact
13 same time down to the second. Obviously, you did not
14 open up and look at 100 files within one second.
15 Something on the computer did that automatically. That
16 would be how we would know that it was a computer
17 function, like an antivirus software, not a user action.

18 Q. Okay. And so it could just be the antivirus is
19 running in the background and scanning it? Is that what
20 you mean by it could be that?

21 A. Yes, sir.

22 Q. Other programs besides antivirus that can scan
23 folders -- scan files that could generate a last-access
24 time?

25 A. Yes, sir. The -- what we have also seen is

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1 files and folders access times changing based on a
2 Windows update. So the Windows operating system gets
3 updated, and for whatever reason, it changes -- decides
4 to change and say, hey, we accessed that folder and,
5 boom, changes all -- again, what we find is that they
6 all have an exact time. That does not change. It's the
7 same to the second. Like, it all matches to the second.

8 Q. And any time that, say, for instance, if other
9 documents stayed in the folder for a longer period of
10 time because this one was deleted, it would have a
11 different last-access time than those, and we wouldn't
12 have any way of knowing about last-access time if it's
13 one of those virus-type situations; is that correct?

14 A. When you have finally done it, I need you to
15 repeat because I did not completely understand the
16 question.

17 Q. Yep. See, I knew -- I knew I would get you
18 there.

19 A. You got me.

20 Q. Yeah. So if we are looking at a folder --
21 right? -- and a document gets deleted out of that
22 folder, does that freeze its last-access times?

23 A. Yes, sir --

24 Q. Okay.

25 A. -- on a -- just remember, we are not looking --

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1 in this particular example, we are not looking at the
2 file. We are looking at a link file. So it's a
3 different file that's created from the file itself. So
4 when you were talking about the file itself, if it --
5 let's put it this way: It can't be accessed if it's
6 gone. So if you deleted the file, the last-access date
7 can't be after that.

8 **Q. Understood. Does the link file provide any,**
9 **like, all access dates or just the last-access date?**

10 A. Just the last --

11 **Q. Okay. All right. Understood.**

12 A. -- and that's the same for each of those. So
13 when we say created date, modified date, access date,
14 there is one date, and it's -- it's the last one --

15 **Q. Got you. All right.**

16 A. -- let me rephrase that. The modified access
17 would be the last one. The created, obviously, is --
18 it's created one time.

19 **Q. All right. Understood. Okay. That helps.**

20 **In this spreadsheet, you have file placed in the**
21 **recycle bin for one of the files?**

22 A. Correct.

23 **Q. Explain that to me.**

24 A. So the copy of ATL residential costing, we had a
25 forensics artifact known as a dollar sign R file, and if

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1 you look at the path, it actually lists the number of
2 that dollar sign R file. That -- there is a dollar sign
3 R and a dollar sign I. The dollar sign I stands for
4 index. The R stands for the recycle bin. What those
5 two files are are Windows artifacts about the trash can,
6 and it allows you to remove a file from the trash can
7 and put it back where it was before. So it's the
8 document itself and then two additional artifacts, the
9 recycle -- the dollar sign R and the dollar sign I.
10 Dollar sign I, the index, says this is where that file
11 came from. So if you go to a file in your trash can and
12 say recover this file, it will put it back where it was
13 before.

14 So we were able to use the dollar sign R file.
15 Even though a copy of ATL residential costing was gone,
16 the dollar sign R file -- dollar sign R file was still
17 on the computer. So we knew about the file even though
18 the file was gone.

19 **Q. Okay. And that's a separate artifact than what**
20 **is in the link file?**

21 **A. Right.**

22 **Q. Okay. And the only one of these four documents**
23 **that had that particular artifact was copy of ATL**
24 **residential costing?**

25 **A. That's correct. The other ones were gone.**

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1 There were no dollar sign R files for the other three.

2 Q. And is there a reason that a dollar sign R file
3 would not exist for those three?

4 A. They got overwritten.

5 Q. Okay. And is that a manual process? Like, can
6 I decide to overwrite this artifact R file --

7 A. No.

8 Q. -- when I am looking at my computer?

9 A. No, sir. It's an automatic function.

10 Q. Okay.

11 MR. CARTWRIGHT: And I will tell you, we
12 have been going about an hour, and I had a little
13 bit of coffee before we started this. So I would
14 like to take a quick nature break. I don't know if
15 you need one or not, but I do.

16 THE WITNESS: Okay, sir.

17 How long?

18 MR. CARTWRIGHT: Any problem with that,
19 Steve?

20 MR. LABRIOLA: No. That's fine.

21 MR. CARTWRIGHT: It's 1:00 P.M. Eastern
22 Time. So I guess let's do five -- let's do ten
23 minutes, and we will come back.

24 THE WITNESS: Thank you, sir.

25 (Recess.)

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1 MR. CARTWRIGHT: And just noting that
2 Craig Johnson and Matt Johnson have joined and are
3 listed in on the deposition, along with the other
4 people who have been present.

5 BY MR. CARTWRIGHT:

6 Q. All right. Mr. Broom, if you could, would you
7 look at what I sent over to you, Exhibit No. 5?

8 A. Okay. I have it open.

9 Q. All right. And this is not part of your report.
10 Do you recognize this e-mail at all?

11 A. I recognize -- yes, the attachments, I
12 recognize.

13 Q. Okay. Did you locate these attachments on any
14 of the devices or accounts other than Matt Johnson's
15 Gmail?

16 A. I do not believe so.

17 Q. Okay. All right. What did you do to prepare
18 for today's deposition?

19 A. Reread the 600 e-mail messages that we have in
20 this case and went through my expert report.

21 Q. Okay. Anything else?

22 A. No, sir.

23 MR. CARTWRIGHT: All right. I have no
24 further questions.

25 THE WITNESS: Had to take a bathroom

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1 break, huh?

2 MR. CARTWRIGHT: Yeah, well, just want to
3 make sure --

4 MR. LABRIOLA: Let me just do this,
5 Wayne: Let me go off the record a minute, and I
6 will consult with the other folks just to make sure
7 I have none. I don't think I do, but let -- let me
8 confirm.

9 MR. CARTWRIGHT: Understood.

10 (Recess.)

11 MR. LABRIOLA: Okay. I have confirmed
12 that I have no questions.

13 MR. CARTWRIGHT: All right. I assume you
14 will read and sign, Mr. Broom.

15 THE WITNESS: Yes, sir.

16 MR. CARTWRIGHT: All right.

17 MR. LABRIOLA: If the Court Reporter can
18 just send it to my attention, I will get it to
19 Mr. Broom.

20

21 (The deposition was concluded at 1:13
22 p.m.)

23

24

25

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1 DISCLOSURE

2 Pursuant to Article 10.B of the Rules and
3 Regulations of the Board of Court Reporting of the
4 Judicial Council of Georgia which states: Each
5 court reporter shall tender a disclosure form at
6 the time of the taking of the deposition stating
7 the arrangements made for the reporting services of
8 the certified court reporter, by the certified
9 court reporter, the court reporter's employer or
10 the referral source for the deposition, with any
11 party to the litigation, counsel to the parties, or
12 other entity. Such form shall be attached to the
13 deposition transcript, I make the following
14 disclosure: I am a Georgia Certified Court
15 Reporter. I am here as a representative of Huseby
16 Global Litigation.

17 Huseby Global Litigation, was
18 contacted to provide court reporting services for
19 the deposition. Huseby Global Litigation, will not
20 be taking this deposition under any contract that
21 is prohibited by O.C.G.A. 9-11-28(c). Huseby
22 Global Litigation, has no contract/agreement to
23 provide reporting services with any party to the
24 case, any counsel in the case, or any reporter or
25 reporting agency from whom a referral might have

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1 been made to cover this deposition. Huseby Global
2 Litigation, will charge its usual and customary
3 rates to all parties in the case, and a financial
4 discount will not be given to any party to this
5 litigation.

6 *Susan DiFilippantonio*

7 Susan DiFilippantonio, Notary Public
8 and Registered Professional Reporter
9 Commission Expires 10-22-2028
10 Georgia Certificate Number 2125

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1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

3 I hereby certify that the foregoing transcript was
4 reported, as stated in the caption, and the questions
5 and answers thereto were reduced to typewriting under my
6 direction; that the foregoing pages represent a true,
7 complete, and correct transcript of the evidence given
8 upon said hearing, and I further certify that I am not
9 of kin or counsel to the parties in the case; am not in
10 the employ of counsel for any of said parties; nor am I
11 in any way interested in the result of said case.

12 *Susan DiFilippantonio*

13 Susan DiFilippantonio, Notary Public
14 and Registered Professional Reporter
Commission Expires 10-22-2028
Georgia Certificate Number 2125

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1 CAPTION

2 The Deposition of NEIL BROWN, taken in the matter,
3 on the date, and at the time and place set out on the
4 title page hereof.

5 It was requested that the deposition be taken by
6 the reporter and that same be reduced to typewritten
7 form.

8 It was agreed by and between counsel and the
9 parties that the Deponent will read and sign the
10 transcript of said deposition.

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1 CERTIFICATE OF REPORTER

2 STATE OF GEORGIA

3 COUNTY OF FULTON

4 Before me, this day, personally appeared, NEIL
5 BROWN, who, being duly sworn, states that the foregoing
6 transcript of his deposition, taken in the matter, on
7 the date, and at the time and place set out on the title
8 page hereof, constitutes a true and accurate transcript
9 of said deposition.

10

11 *If no changes need to be made on the following two
12 pages, place a check here _____, and return only this
13 signed page.*

14

15

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1 DEPOSITION ERRATA SHEET

2 Assignment No. 460899

3 Case Caption: D.H. Pace Company, Inc. -vs- Matthew
4 Johnson, et al.

5 Witness: NEIL BROWN

6 DECLARATION UNDER PENALTY OF PERJURY I declare
7 under penalty of perjury that I have read the entire
8 transcript of my deposition taken in the captioned
9 matter or the same has been read to me, and the same is
10 true and accurate, save and except for changes and/or
11 corrections, if any, as indicated by me on the
12 DEPOSITION ERRATA SHEET hereof, with the understanding
13 that I offer these changes as if still under oath.

14 _____ There are no changes noted.

15 _____ The following changes are noted:

16 Page No.____Line No.____
Should read:

17 _____

18 Reason for Change:_____
Page No.____Line No.____
Should read:

19 _____

20 Reason for Change:_____
Page No.____Line No.____
Should read:

21 _____

22 Reason for Change:_____
Page No.____Line No.____
Should read:

23 _____

24 Reason for Change:_____

25 _____

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1 Page No.____Line No.____
Should read:

2 _____

3 Reason for Change:_____

Page No.____Line No.____

4 Should read:

5 _____

6 Reason for Change:_____

7 SIGNATURE OF DEPONENT

8 _____

9 NEIL BROWN

10 Sworn to and subscribed before me
this ____ day of _____, _____.

11

12

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Neil Broom on 07/25/2023

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D.H. PACE COMPANY, INC. vs MATTHEW JOHNSON, ET AL.

Neil Broom on 07/25/2023

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D.H. PACE COMPANY, INC. vs MATTHEW JOHNSON, ET AL.

Neil Broom on 07/25/2023

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
Atlanta Division**

D. H. PACE COMPANY, INC.,

Plaintiff,

v.

MATTHEW JOHNSON, LIBERTY
GARAGE DOOR SERVICES, LLC, and
CRAIG JOHNSON,

Defendants.

Civil Action No. 1:22-cv-01005-
SEG

EXPERT REPORT OF NEIL BROOM

1. I was retained by attorney Stephen T. LaBriola from Fellows LaBriola LLP to assist with the Preservation, Collection and Production of Electronically Stored Information in this matter.

2. As part of the collection of 33 computers, cellphones, email accounts, and online storage accounts, I examined Matt Johnson's HP Laptop computer.

3. Additionally, I reviewed the email messages from Matt Johnson's Gmail account, "mattjohnson2267@gmail.com" and located an email Matt Johnson sent himself on January 28, 2021, from his DH Pace email address, "MattM.Johnson@dhpace.com," with the subject "Fwd: Fwd: pricing."

4. This "January 28, 2021" email message contained four attachments that will be the subject of this Expert Report.



STATEMENT OF QUALIFICATONS

5. I am the President and Laboratory Director of Technical Resource Center, Inc. As an expert witness, investigator, speaker, trainer, course director, and consultant in the fields of Computer Forensics, Cell Phone Forensics, Call Detail Records and Geolocation Analysis, Network and Computer Security, Information Assurance, and Professional Security Testing, I have over 30 years of experience providing investigative, technical, educational, and security services to the military, attorneys, law enforcement, the health care industry, financial institutions, and government agencies.

6. I am a licensed California Private Investigator, Florida Private Investigator, Texas Private Investigator, Michigan Professional Investigator, Utah Private Investigator, South Carolina Private Investigator, Georgia Private Detective, and Private Detective Instructor.

7. I have been a qualified Expert Witness in Federal and State Courts and have been appointed to the Los Angeles Superior Court Panel of Expert Witnesses for “Computer Forensics” and “Cellular and GPS Mapping and Analysis.”

8. I was the Developer of the Technical Resource Center’s *JumpStart Computer Forensics (Applied Computer Forensics)* course and the ProDiscover Certified Examiner training course and certification. I have provided training in the fields of Computer Forensics and Information Security to over 3,000 students in the

US Government, US Military, US Intelligence Agencies, and Fortune 500 companies in the United States and abroad.

9. I coauthored a technical book in 2004 for Sybex Publishing titled *Computer Forensics JumpStart*. The book is a primer for anyone interested in entering the Computer Forensics field. I was also the Technical Editor of the 2nd edition of this book released in 2011.

10. I currently serve on the Ethical Standards Committee of the International Society of Forensic Computer Examiners (ISFCE) and previously served on the National Leadership Assembly of the American Society of Digital Forensics & eDiscovery (ASDFED). Additionally, I am the past Chairman of the Digital Evidence Subcommittee for the International Association for Identification (IAI) and a former member of the Delegate Assembly for the American Society of Crime Laboratory Directors / Laboratory Accreditation Board (ASCLD/LAB).

11. I hold multiple security certifications including: Certified Computer Examiner (CCE), Certified Fraud Examiner (CFE), Certified Information Systems Security Professional (CISSP), EnCase Certified Examiner (EnCE), AccessData Certified Examiner (ACE), AccessData Certified Investigator, Cellebrite Certified Mobile Examiner (CCME), Cellebrite Certified Physical Analyst (CCPA), and Cellebrite Certified Operator (CCO).

12. I was awarded a Bachelor of Science (BS) in Computer Forensics and

Digital Investigation and a Master of Science (MS) in Digital Forensic Management from Champlain College.

13. A true and correct copy of my curriculum vitae is attached hereto as Exhibit A.

14. I was retained by counsel for the Plaintiff. I am being compensated at the rate of \$400 per hour for evidence collection, analysis, consultation, report creation, and testimony.

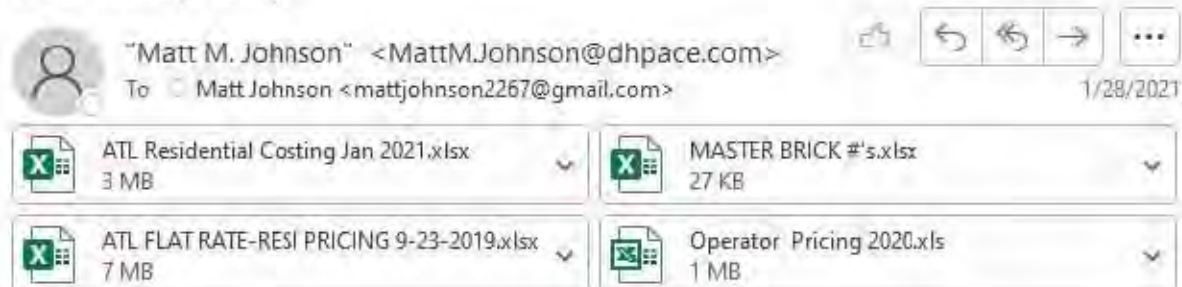
JANUARY 28, 2021 EMAIL MESSAGE

15. The email message from Matt Johnson's Gmail account, "mattjohnson2267@gmail.com," he sent himself on January 28, 2021, from his DH Pace email address, "MattM.Johnson@dhpac.com," with the subject "Fwd: Fwd: pricing," contained four spreadsheet attachments:

- A. "ATL Residential Costing Jan 2021.xlsx"
- B. "ATL FLAT RATE-RESI PRICING 9-23-2019.xlsx"
- C. "MASTER BRICK #'s.xlsx"
- D. "Operator Pricing 2020.xls"

16. The “January 28, 2021” email message:

Fwd: Fwd: pricing




Matt Johnson

Residential Service Department Manager
Overhead Door Company of Atlanta & Northeast Georgia

From: Matt M. Johnson <MattM.Johnson@dhpac.com>
Sent: Thursday, January 28, 2021 4:10:58 PM
To: Matt M. Johnson <MattM.Johnson@dhpac.com>
Subject: pricing

Matt M. Johnson, Residential Department Manager
 Manager
 Overhead Door Company of Atlanta

Office: (404) 872-3667
 Mobile: (470) 426-2317
 Email: MattM.Johnson@dhpac.com
www.overheaddooratlanta.com

 The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

Overhead Door Co. of Atlanta - 5105 Avalon Ridge Parkway NW - Peachtree Corners, GA 30071
 We moved! Please note our new address above.

MATT JOHNSON'S HP LAPTOP

17. An examination of Matt Johnson's HP Laptop computer showed the four spreadsheet attachments to the "January 28, 2021" email message were created on the HP Laptop on August 21, 2021 at 1:00 PM.

18. The four spreadsheet attachments were located in the directory named "microsoft.windowscommunicationsapps_8wekyb3d8bbwe."

- A. "ATL Residential Costing Jan 2021(2306).xlsx"
- B. "ATL FLAT RATE-RESI PRICING 9-23-2019(2308).xlsx"
- C. "MASTER BRICK #'s(2307).xlsx"
- D. "Operator Pricing 2020(2309).xls"

19. By default, attachments received in the Microsoft Mail and Calendar App download to this directory.

20. The four spreadsheet attachments are still in this directory; they are NOT deleted.

HP LAPTOP DESKTOP "BUSINESS OPPORTUNITY"

21. Matt Johnson's Desktop had a directory named "Business Opportunity" that was created on May 4, 2021.

22. On August 21, 2021 at 1:03 PM, the file named "Copy of ATL FLAT RATE-RESI PRICING 9-23-2019(2308).xlsx" was created in the "Business

Opportunity” directory and it was last accessed on December 6, 2021 at 10:56 AM.

23. On August 21, 2021 at 1:06 PM, the file named “Copy of ATL Residential Costing.xlsx” was created in the “Business Opportunity” directory and it was last accessed on December 6, 2021 at 10:32 AM.

24. On August 21, 2021 at 1:07 PM, the file named “Copy of Operator Pricing 2020.xls” was created in the “Business Opportunity” directory and it was last accessed on January 30, 2022 at 12:01 PM.

25. On August 21, 2021 at 1:08 PM, the file named “Copy of MASTER BRICK #'s.xlsx” was created in the “Business Opportunity” directory and it was last accessed on December 16, 2021 at 2:46 PM.


26. The four spreadsheet attachments are no longer in this directory; they are deleted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Expert Report was executed at Huntington Beach, California on June 29, 2023.



Neil Broom, President and Lab Director

Technical Resource Center, Inc.

From: MattM.Johnson@dhpac.com 
Subject: Fwd: pricing
Date: January 28, 2021 at 4:14 PM
To: mattjohnson2267@gmail.com



Matt Johnson

Residential Service Department Manager
Overhead Door Company of Atlanta & Northeast Georgia

From: Matt M. Johnson <MattM.Johnson@dhpac.com>
Sent: Thursday, January 28, 2021 4:10:58 PM
To: Matt M. Johnson <MattM.Johnson@dhpac.com>
Subject: pricing

Matt M. Johnson, Residential Department Manager
Manager

Overhead Door Company of Atlanta

Office: (404) 872-3667

Mobile: (470) 426-2317

Email: MattM.Johnson@dhpac.com

www.overheaddooratlanta.com



Overhead Door Co. of Atlanta - 5105 Avalon Ridge Parkway NW - Peachtree Corners, GA 30071

We moved! Please note our new address above.



ATL Residential
Costin...21.xlsx



MASTER BRICK
#'s.xlsx



ATL FLAT RATE-
RESI P...19.xlsx



Operator
Pricing 2020.xls



DH PACE_000044

From: [Neil Broom](#)
To: [Wayne Cartwright](#), [Steve LaBriola](#), [Sharika Zutshi](#), [David A. Roberts](#), [Ethan Knott](#), [Karen Prouty Conklin](#)
CC: [Sharika Zutshi](#), [David A. Roberts](#)
Date: Tue, 12 Jul 2022 00:00:34 +0000
Subject: DH Pace v. Liberty Garage Service - ESI Protocol - Production 07.11.22
Attachment(s): 1

Wayne,

I was contacted by Steve today in reference to the new deadline of tomorrow imposed by the Court.

Based on the ESI Protocol (Dated 05/27/22), Paragraph 5. "Upon locating Confidential Information, as defined in this protocol, the forensic investigator shall gather the documents electronically and make a list of the documents located, including identifying them by file type, name, size, date, location, etc. The *list* will be published to both parties and may be seen by Plaintiff and Plaintiff's counsel

We have located additional data concerning the "Confidential Information" files. The data is listed in the attached spreadsheet and summarized below:

"Copy of ATL Residential Costing.xlsx" was last accessed on 12/06/21 at 10:32 AM
"Copy of ATL FLAT RATE-RESI PRICING 9-23-2019(2308).xlsx" was last accessed on 12/06/21 at 10:56 AM
"Copy of MASTER BRICK #'s.xlsx" was last accessed on 12/16/21 at 2:46 PM
"Copy of Operator Pricing 2020.xls" was last accessed on 1/30/22 at 12:01 PM

"Copy of ATL Residential Costing.xlsx" was put in the recycle bin on 12/06/21 at 10:32 AM

Thank you,

Neil Broom

President



Technical Resource Center, Inc.

20422 Beach Blvd

Suite 205

Huntington Beach CA 92648

800-839-2088 Toll Free

678-428-6304 Cell Phone

nbroom@trcglobal.com

www.trcglobal.com

Licensed California Private Investigator #28170

Licensed Florida Private Investigative Agency #A1700255

Licensed Georgia Private Detective Agency #PDC002261

Licensed Michigan Professional Investigator Agency #3701207406

Licensed Texas Private Investigation Company #A06230801

Licensed Utah Private Investigation Agency #P112091

<u>Name</u>	<u>Local Path</u>	<u>File Size</u>	<u>Creation</u> <u>Date</u>	<u>Creation Time</u> <u>(Local)</u>	<u>Last Write</u> <u>Date</u>	<u>Last Write</u> <u>Time (Local)</u>	<u>Last Access</u> <u>Date</u>	<u>Last Access Time</u> <u>(Local)</u>
Copy of ATL Residential Costing.xlsx	C:\Users\mattj\Desktop\Business Opportunity\Copy of ATL Residential Costing.xlsx	3025358	8/21/21	1:06:05 PM	8/21/21	1:06:06 PM	12/6/21	10:32:36 AM
Copy of ATL FLAT RATE-RESI PRICING 9-23-2019(2308).xlsx	C:\Users\mattj\Desktop\Business Opportunity\Copy of ATL FLAT RATE-RESI PRICING 9-23-2019(2308).xlsx	6835099	8/21/21	1:03:55 PM	8/21/21	1:03:55 PM	12/6/21	10:56:30 AM
Copy of MASTER BRICK #s.xlsx	C:\Users\mattj\Desktop\Business Opportunity\Copy of MASTER BRICK #s.xlsx	27818	8/21/21	1:08:13 PM	8/21/21	1:08:13 PM	12/16/21	2:46:31 PM
Copy of Operator Pricing 2020.xls	C:\Users\mattj\Desktop\Business Opportunity\Copy of Operator Pricing 2020.xls	1522176	8/21/21	1:07:09 PM	1/30/22	12:01:45 PM	1/30/22	12:01:45 PM
Volume Type	Fixed Disk							
Volume Label	Windows							
Volume Serial Number	34E4-1A1F							
File Placed in Recycle Bin								
Copy of ATL Residential Costing.xlsx	\\$Recycle.Bin\S-1-5-21-1863777284-2756988070-2401669943-1001\SRL91L12.xlsx						12/6/21	10:32:36 AM

From: [Neil Broom](#)
To: [David A. Roberts](#), [Wayne Cartwright](#), [Genie Iredale](#), [Sharika Zutshi](#), [Steve LaBriola](#), [Ethan Knott](#), [Karen Prouty Conklin](#)
CC: [Steve LaBriola](#), droberts@hgrslaw.com
Date: Jan 9, 2023 at 1:49 PM
Subject: RE: DH Pace/Liberty, et al
Attachment(s): 4

External sender. Use caution with links and attachments.

All,

As requested, I have attached the "Business Opportunity" and "Business Opportunities" file listing spreadsheets.

Neil

From: Ethan Knott <eknott@fellab.com>
Sent: Monday, January 9, 2023 9:59 AM
To: Neil Broom <nbroom@trcglobal.com>
Cc: Steve LaBriola <slabriola@fellab.com>; Sharika Zutshi <szutshi@fellab.com>; Genie Iredale <giredale@fellab.com>; Wayne Cartwright <wcartwright@hgrslaw.com>; droberts@hgrslaw.com; Karen Prouty Conklin <kconklin@fellab.com>
Subject: FW: DH Pace/Liberty, et al

Neil,

We hope you're doing well. I've copied all counsel on this email. Please see the highlights below. Can you please provide the parties with file listing spreadsheets for the below-referenced folders?

Thanks.

Ethan



Ethan M. Knott, Esq.

Fellows LaBriola LLP

233 Peachtree Street, N.E.

Suite 2400, Harris Tower

Atlanta, GA 30303

(404) 586-9200

(404) 586-2047 (Direct Dial)

(239) 770-1108 (Cell)

eknott@fellab.com

www.fellab.com

From: Wayne Cartwright <wcartwright@hgrslaw.com>

Date: Friday, January 6, 2023 at 12:08 PM

To: Ethan Knott <eknott@fellab.com>

Cc: Karen Prouty Conklin <kconklin@fellab.com>, Sharika Zutshi <szutshi@fellab.com>, David A. Roberts <droberts@hgrslaw.com>, Steve LaBriola <slabriola@fellab.com>

Subject: RE: DH Pace/Liberty, et al

Hi Ethan,

Attached is a joint motion and proposed order extending the deadlines by a month. I extended the MSJ deadline by a little more than a month because 4/1 is on a Saturday.

As to your second question, yes Mr. Broom can provide a list to both parties of all files located in those folders.

Thanks,
Wayne

Wayne M. Cartwright

Associate I d. 404-537-5511 | c. 229-868-1777 | wcartwright@hgrslaw.com

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From: Ethan Knott <eknott@fellab.com>

Sent: Thursday, January 5, 2023 6:16 AM

To: Wayne Cartwright <wcartwright@hgrslaw.com>

Cc: Karen Prouty Conklin <kconklin@fellab.com>; Sharika Zutshi <szutshi@fellab.com>; David A. Roberts <droberts@hgrslaw.com>; Steve LaBriola <slabriola@fellab.com>

Subject: Re: DH Pace/Liberty, et al

External sender. Use caution with links and attachments.

Thanks, Wayne. We are happy to consent to a one-month extension of the discovery period. Do you want to prepare a joint motion for us to submit to the Court? We will discuss February deposition dates with our client and get back to you.

Separately, during his deposition, Matt Johnson testified to folders on his personal computer called "Business Opportunity" and "Business Opportunities." In accordance with the ESI Protocol/ Supplemental ESI Protocol, will you consent to Neil Broom providing us with file listing spreadsheets for these folders?

Best regards,

Ethan



Ethan M. Knott, Esq.

Fellows LaBriola LLP

233 Peachtree Street, N.E.

Suite 2400, Harris Tower

Atlanta, GA 30303

(404) 586-9200

(404) 586-2047 (Direct Dial)

(239) 770-1108 (Cell)

eknott@fellab.com

<https://link.edgepilot.com/s/1b6703e9/Vb5oPN4nUUGckJAeJ7vXHA?u=http://www.fellab.com/>

From: Wayne Cartwright <wcartwright@hgrslaw.com>

Date: Wednesday, January 4, 2023 at 12:10 PM

To: Ethan Knott <eknott@fellab.com>

Cc: Karen Prouty Conklin <kconklin@fellab.com>, Sharika Zutshi <szutshi@fellab.com>, David A. Roberts <droberts@hgrslaw.com>, Steve LaBriola <slabriola@fellab.com>

Subject: RE: DH Pace/Liberty, et al

Ethan,

Understood. We will get the notice served soon so y'all can file the objections.

Unfortunately, though, I've had another matter take over my week of 12/23. Would y'all be amenable to a short, maybe 1 month, discovery extension (current deadline is 12/31) and setting these depositions for the first or second week of February?

Thanks,
Wayne

Wayne M. Cartwright

Associate I d. 404-537-5511 | c. 229-868-1777 | wcartwright@hgrslaw.com

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From: Ethan Knott <eknott@fellab.com>
Sent: Tuesday, January 3, 2023 11:21 AM
To: Wayne Cartwright <wcartwright@hgrslaw.com>
Cc: Karen Prouty Conklin <kconklin@fellab.com>; Sharika Zutshi <szutshi@fellab.com>; David A. Roberts <droberts@hgrslaw.com>; Steve LaBriola <slabriola@fellab.com>
Subject: Re: DH Pace/Liberty, et al

External sender. Use caution with links and attachments.

Wayne,

Thanks for providing these topics. We are working with DH Pace to identify an appropriate witness(es). Due to the breadth of the topics, we wanted to let you know that we plan on filing objections and producing the witness(es) subject to those objections.

Let's tentatively plan on January 26, 2023, for the Rule 30(b)(6) deposition.

Best regards,



Ethan M. Knott, Esq.

Fellows LaBriola LLP

233 Peachtree Street, N.E.

Suite 2400, Harris Tower

Atlanta, GA 30303

(404) 586-9200

(404) 586-2047 (Direct Dial)

(239) 770-1108 (Cell)

eknott@fellab.com

<https://link.edgepilot.com/s/33fb5ee3/pl7jDppRsE65rF-jSd74rw?u=http://www.fellab.com/>

From: Wayne Cartwright <wcartwright@hgrslaw.com>

Date: Thursday, December 29, 2022 at 1:20 PM

To: Steve LaBriola <slabriola@fellab.com>

Cc: Ethan Knott <eknott@fellab.com>, Karen Prouty Conklin <kconklin@fellab.com>, Sharika Zutshi <szutshi@fellab.com>, David A. Roberts <droberts@hgrslaw.com>

Subject: RE: DH Pace/Liberty, et al

Steve,

Attached are the 30(b)(6) topics. Once we have a date(s), I'll serve the notices.

Thanks,

Wayne

Wayne M. Cartwright

Associate I d. 404-537-5511 | c. 229-868-1777 | wcartwright@hgrslaw.com

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From: Wayne Cartwright

Sent: Wednesday, December 21, 2022 2:17 PM

To: Steve LaBriola <slabriola@fellab.com>

Cc: Ethan Knott <eknott@fellab.com>; Karen Prouty Conklin <kconklin@fellab.com>; Sharika Zutshi <szutshi@fellab.com>; David A. Roberts <droberts@hgrslaw.com>

Subject: RE: DH Pace/Liberty, et al

Understood. Please keep the January 23-26 dates available. I'll get you the topics for the 30(b)(6) next week.

Thanks,

Wayne

Wayne M. Cartwright

Associate I d. 404-537-5511 | c. 229-868-1777 | wcartwright@hgrslaw.com

Hall, Gilligan, Roberts & Shanlever llp

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From: Steve LaBriola <slabriola@fellab.com>
Sent: Wednesday, December 21, 2022 2:15 PM
To: Wayne Cartwright <wcartwright@hgrslaw.com>
Cc: Ethan Knott <eknott@fellab.com>; Karen Prouty Conklin <kconklin@fellab.com>; Sharika Zutshi <szutshi@fellab.com>; David A. Roberts <droberts@hgrslaw.com>
Subject: Re: DH Pace/Liberty, et al

External sender. Use caution with links and attachments.

Wayne,

January 18 is no longer available.



Stephen T. LaBriola, Esq.

Fellows LaBriola LLP

Suite 2400, Harris Tower, Peachtree Center

233 Peachtree Street, N.E.

Atlanta, GA 30303-1731

(404) 586-9200 (Main)

(404) 586-2020 (Direct)

(404) 529-4028 (Direct Fax)

slabriola@fellab.com

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From: "Stephen T. LaBriola" <slabriola@fellab.com>

Date: Tuesday, December 20, 2022 at 3:21 PM

To: Wayne Cartwright <wcartwright@hgrslaw.com>

Cc: Ethan Knott <eknott@fellab.com>, Karen Prouty Conklin <kconklin@fellab.com>, Sharika Zutshi <szutshi@fellab.com>, David Roberts <droberts@hagllp.com>

Subject: DH Pace/Liberty, et al

Wayne,

While I still need 30b6 topics from you, it appears we can do depositions (DH Pace 30b6 and Chris Bryson) on the following dates: January 16 – 18 and January 23 – 26.



Stephen T. LaBriola, Esq.

Fellows LaBriola LLP

Suite 2400, Harris Tower, Peachtree Center

233 Peachtree Street, N.E.

Atlanta, GA 30303-1731

(404) 586-9200 (Main)

(404) 586-2020 (Direct)

(404) 529-4028 (Direct Fax)

slabriola@fellab.com

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<u>Name</u>	<u>Item #</u>	<u>Comment</u>	<u>Path</u>	<u>Category</u>	<u>Ext</u>
Image Overhead Door of Georgia.docx	262413		22024AB.001/Basic data partition (3)/Windows [NTFS]/[root]/Users/mattj/Downloads/Business Opportunities/Image Overhead Door of Georgia.docx	Microsoft Word 2016 XML	docx

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<u>Actual File</u>	<u>Carved</u>	<u>Compressed</u>	<u>Deleted</u>	<u>Duplicate File</u>	<u>eDiscovery Duplicate File</u>	<u>Author</u>	<u>Last Printed</u>	<u>Last Saved By</u>
TRUE	FALSE	FALSE	FALSE			Craig Johnson	4/9/2021 8:53:00 AM (2021-04-09 12:53:00 UTC)	Matt Johnson

<u>Last Saved Time</u>	<u>Revision Number</u>	<u>Total Editing Time</u>	<u>Track Changes</u>	<u>Encrypted</u>	<u>From Recycle Bin</u>	<u>Recycle Bin Original Name</u>	<u>Email File</u>
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<u>Email Message</u>	<u>Subject</u>	<u>Submit Time</u>	<u>Delivery Time</u>	<u>From</u>	<u>To</u>	<u>CC</u>	<u>BCC</u>	<u>Has Attachment</u>	<u>Attachment</u>	<u>Attachment Count</u>	<u>Forwarded</u>	<u>From Email</u>	<u>Reply</u>	<u>Unsent</u>	<u>Unread</u>
FALSE									FALSE			FALSE			

<u>Name</u>	<u>Item #</u>	<u>Comment</u>
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Carved [356787].jpeg	865134	
Carved [421990].jpeg	865135	
Carved [679754].jpeg	865136	
1st Draft LOGO.PNG	260567	
2 - Individual Binder[1787].pdf	260581	
Carved [235886].jpeg	884978	
6-9 Meeting Update MJ.docx	260560	
6.9.21 Overhead Door Metting Agenda[574].docx	260588	
Application Checklist - Binder.xlsm	260574	
vmlDrawing1.vml	866107	
image1.tiff	866061	
PROJECT	1121666	
Blank Personal_Financial_Statement.xls	260575	
Business Census Insurance.xls	260561	
Business Logo Mock Up A.PNG	260562	
CapEx.Startup.Runningcash.sheet(595).xlsx	260558	
Copy of CapEx.Startup.Runningcash.sheet(595).xlsx	260559	
Copy of Door Company 2022 Proforma.xlsx	260582	
COVID Status Form[1789].pdf	260578	
Carved [103802].jpeg	884986	
Door Company 2022 Proforma 2-6mo(596).xlsx	260564	
Door Company 2022 Proforma(492) COMBINED.xlsx	260570	
Door Company 2022 Proforma(492).xlsx	261558	
Door Company 2022 Proforma[769].pdf	260580	
Door Company 2023 Proforma.xlsx	260563	
Door Company 2023 Proforma[770].pdf	261556	
Door Company 2024 Proforma[771].pdf	260583	
EXPENSES 1ST DRAFT .docx	260589	
EXPENSES 1ST DRAFT.xlsx	260579	
Hinge Chart.PNG	261559	
Image Overhead Door of Georgia 1st Draft.docx	260573	
Individual Binder.pdf	261557	
Carved [451500].jpeg	888391	
Cart_partsstore TORSION SPR INV.pdf	261555	
Copy of 2-Inventory List Detailed-Questions UPDATED.xlsm	261554	
PROJECT	1193906	
Extension Springs Quote.PNG	261553	
GateHouseSupplies.com - Shopping Cart LM OP INV.pdf	261552	
Carved [2833].jpeg	886037	
Carved [30526].jpeg	886038	
Carved [46227].jpeg	886039	
Carved [54147].jpeg	886040	
GENIE 8FT EXT KIT INV.PNG	261551	
GENIE SIDE MOUNT OP INV.PNG	260600	
Inventory List Detailed.xlsm	260599	

PROJECT	1198009
LM 7ft Rail QUOTE.PNG	260598
LM 8FT Rail QUOTE.PNG	260597
Lube 3 in 1 QUOTE.PNG	260596
Shopping Cart INV.pdf	260595
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Carved [33372].jpeg	886001
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Carved [38443].jpeg	886029
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Carved [5162].jpeg	886026
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Carved [59071].jpeg	886032
Carved [64116].jpeg	886033
Carved [86895].jpeg	886034
Steel Bearing QUOTE.PNG	260593
The Home Depot - Shopping Cart GENIE OPS INV.pdf	260592
Liberty Door CapEx.Startup.Cash Requirements sheet[772].pdf	260577
Liberty Garage Door Services Business Plan[768].pdf	260576
Liberty Garage Door Services EDIT IN PROGRESS .docx	260569
Liberty Operating Agreement[1183].docx	260571
Masters Overhead Door Company EDIT IN PROGRESS .docx	260566
Organizational Charts.xlsx	260565
Personal Financial Statement[794].pdf	260586
Carved [54055].jpeg	884969
Personal_Financial_Statement.xls	260587
Truck Quotes From JW Truck Sales.pdf	260568
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unk2	260584
unk3	261952
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SmallLogo.jpg	259390
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SmallLogoBW.jpg	259386
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400dpiLogoCropped.jpg	849963
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SmallLogoBW.jpg	849969
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readme.txt	849975

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Microsoft Word 2016 XML	docx	6/8/2021 5:49:21 PM (2021-06-08 21:49:21 UTC)
Excel 2013 Binary	xlsm	8/17/2021 8:04:40 PM (2021-08-18 00:04:40 UTC)
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PNG	png	12/26/2021 1:19:16 PM (2021-12-26 18:19:16 UTC)
Adobe Acrobat	pdf	12/26/2021 1:19:16 PM (2021-12-26 18:19:16 UTC)
Adobe Acrobat	pdf	7/15/2021 2:38:40 PM (2021-07-15 18:38:40 UTC)
Adobe Acrobat	pdf	7/15/2021 2:41:33 PM (2021-07-15 18:41:33 UTC)
Microsoft Word 2016 XML	docx	6/22/2021 5:18:50 PM (2021-06-22 21:18:50 UTC)
Microsoft Word 2016 XML	docx	8/15/2021 9:04:09 PM (2021-08-16 01:04:09 UTC)
Microsoft Word 2016 XML	docx	6/8/2021 5:53:36 PM (2021-06-08 21:53:36 UTC)
Excel 2016	xlsx	6/1/2021 3:59:05 PM (2021-06-01 19:59:05 UTC)
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Adobe Acrobat	pdf	n/a
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7 bit text	txt	n/a

Modified

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8/17/2021 8:05:37 PM (2021-08-18 00:05:37 UTC)
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8/17/2021 8:04:41 PM (2021-08-18 00:04:41 UTC)
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8/17/2021 8:11:19 PM (2021-08-18 00:11:19 UTC)
10/30/2021 12:45:41 PM (2021-10-30 16:45:41 UTC)
11/30/2021 2:30:26 PM (2021-11-30 19:30:26 UTC)
6/27/2021 3:01:25 PM (2021-06-27 19:01:25 UTC)
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n/a

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12/22/2021 5:07:59 PM (2021-12-22 22:07:59 UTC)

12/9/2021 7:13:52 PM (2021-12-10 00:13:52 UTC)

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12/9/2021 6:14:31 PM (2021-12-09 23:14:31 UTC)

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7/10/2021 3:00:18 PM (2021-07-10 19:00:18 UTC)

8/15/2021 9:04:10 PM (2021-08-16 01:04:10 UTC)

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8/17/2021 8:02:15 PM (2021-08-18 00:02:15 UTC)

8/17/2021 8:02:15 PM (2021-08-18 00:02:15 UTC)

8/17/2021 8:02:14 PM (2021-08-18 00:02:14 UTC)

8/17/2021 8:02:14 PM (2021-08-18 00:02:14 UTC)

6/2/2017 3:25:12 PM (2017-06-02 19:25:12 UTC)

7/13/2017 9:57:00 AM (2017-07-13 13:57:00 UTC)

7/13/2017 9:57:00 AM (2017-07-13 13:57:00 UTC)
7/13/2017 9:57:00 AM (2017-07-13 13:57:00 UTC)
7/13/2017 9:57:00 AM (2017-07-13 13:57:00 UTC)
7/13/2017 9:57:00 AM (2017-07-13 13:57:00 UTC)
7/13/2017 9:57:00 AM (2017-07-13 13:57:00 UTC)
7/13/2017 9:57:00 AM (2017-07-13 13:57:00 UTC)
7/13/2017 9:57:00 AM (2017-07-13 13:57:00 UTC)
7/13/2017 9:57:00 AM (2017-07-13 13:57:00 UTC)

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n/a	3014	n/a
n/a	5898	n/a
n/a	11587	n/a
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12/6/2021 10:56:16 AM (2021-12-06 15:56:16 UTC)	876300	876544
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12/6/2021 10:56:15 AM (2021-12-06 15:56:15 UTC)	15463	16384
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2/12/2022 4:04:33 PM (2022-02-12 21:04:33 UTC)	113963	114688
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n/a	357	n/a
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2/12/2022 4:06:26 PM (2022-02-12 21:06:26 UTC)	329856	331776
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12/6/2021 10:56:15 AM (2021-12-06 15:56:15 UTC)	23297	24576
12/6/2021 10:56:15 AM (2021-12-06 15:56:15 UTC)	161787	163840
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12/6/2021 10:56:14 AM (2021-12-06 15:56:14 UTC)	136528	139264
12/6/2021 10:56:14 AM (2021-12-06 15:56:14 UTC)	132567	135168
12/6/2021 10:56:14 AM (2021-12-06 15:56:14 UTC)	14494	16384
12/6/2021 10:56:14 AM (2021-12-06 15:56:14 UTC)	11261	12288
12/6/2021 10:56:14 AM (2021-12-06 15:56:14 UTC)	6627	8192
12/6/2021 10:56:13 AM (2021-12-06 15:56:13 UTC)	25667	28672
12/6/2021 10:56:13 AM (2021-12-06 15:56:13 UTC)	1311121	1314816
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12/26/2021 1:19:18 PM (2021-12-26 18:19:18 UTC)	1249785	1253376
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12/26/2021 1:19:18 PM (2021-12-26 18:19:18 UTC)	95532	98304
12/26/2021 1:19:17 PM (2021-12-26 18:19:17 UTC)	331959	335872
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n/a	2567	n/a
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n/a	372	n/a
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n/a	619 n/a	
12/26/2021 1:19:17 PM (2021-12-26 18:19:17 UTC)	214049	217088
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n/a	1155 n/a	
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12/6/2021 10:56:12 AM (2021-12-06 15:56:12 UTC)	125550	126976
2/12/2022 4:05:44 PM (2022-02-12 21:05:44 UTC)	374452	376832
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12/6/2021 10:56:12 AM (2021-12-06 15:56:12 UTC)	29747	32768
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12/6/2021 10:56:12 AM (2021-12-06 15:56:12 UTC)	82742	86016
n/a	2734 n/a	
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10/10/2021 10:28:19 AM (2021-10-10 14:28:19 UTC)	219	224
10/10/2021 10:28:19 AM (2021-10-10 14:28:19 UTC)	219	224
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5/4/2021 7:16:24 PM (2021-05-04 23:16:24 UTC)	12138	12288
5/27/2021 7:51:31 PM (2021-05-27 23:51:31 UTC)	21613	24576

5/27/2021 7:51:31 PM (2021-05-27 23:51:31 UTC)	214029	217088
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<u>Duplicate File</u>	<u>eDiscovery</u>	<u>Duplicate Fil</u>	<u>Author</u>

Secondary Smith, Kassandra Maness

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Smith, Kassandra Maness

Matt Johnson

Craig Johnson

Smith, Kassandra Maness

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Smith, Kassandra Maness

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Matt Johnson
Craig Johnson
Craig Johnson
Jennifer Smith
Craig Johnson
Matt Johnson

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6/10/2021 2:16:31 PM (2021-06-10 18:16:31 UTC)
6/10/2021 2:16:31 PM (2021-06-10 18:16:31 UTC)
5/13/2021 10:21:43 AM (2021-05-13 14:21:43 UTC)

Matt Johnson
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6/8/2021 11:28:31 AM (2021-06-08 15:28:31 UTC)
5/13/2021 10:21:43 AM (2021-05-13 14:21:43 UTC)
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5/13/2021 10:21:43 AM (2021-05-13 14:21:43 UTC)

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4/9/2021 8:53:00 AM (2021-04-09 12:53:00 UTC)

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3/12/2014 4:16:00 PM (2014-03-12 20:16:00 UTC)
4/9/2021 8:53:00 AM (2021-04-09 12:53:00 UTC)

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Last Saved Time**Revision Numbe**

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6/27/2021 3:01:25 PM (2021-06-27 19:01:25 UTC)
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Message

From: "Matt M. Johnson" [MattM.Johnson@dhpace.com]
on behalf of "Matt M. Johnson"
Sent: 1/13/2021 7:41:45 PM
To: Matt Johnson <mattjohnson2267@gmail.com> [mattjohnson2267@gmail.com]
Subject: rev numbers
Attachments: 266-Supr_Scorecard_Summ_res 2017.pdf; 266-Supr_Scorecard_Summ_RES_TM 2016.pdf; Supr_Scorecard_Summ_RES_TM 2015.pdf; 266-Supr_Scorecard_Summ_res 2018.pdf; 266-Supr_Scorecard_Summ_res 2019.pdf

Matt M. Johnson, Residential Department Manager
Manager
Overhead Door Company of Atlanta

Office: (404) 872-3667
Mobile: (470) 426-2317
Email: MattM.Johnson@dhpace.com
www.overheaddooratlanta.com



Overhead Door Co. of Atlanta - 5105 Avalon Ridge Parkway NW - Peachtree Corners, GA 30071
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